

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

_____	:	Chapter 13
In re:	:	
Daniel Lee and Nicole Lee	:	
	:	Bk. # 15-10702
_____	:	

OBJECTION TO CERTIFICATION OF DEFAULT FILED ON MAY 29, 2018

1. Debtors filed the instant bankruptcy on January 30, 2015.
2. One of Debtors' creditors is Toyota Lease Trust, who is a secured creditor of a motor vehicle leased by Debtors for a Toyota Sequoia.
3. Debtors fell behind on their car payments post petition and entered into a stipulation approved by this court on March 31, 2016 resolving a Motion for Relief filed by Toyota Lease Trust.
4. Due to no fault of their own, Debtors fell behind on their payments to Toyota Lease Trust pursuant to the stipulation.
5. More specifically, Debtor Daniel Lee was wrongfully not paid by his employer for several months (from February 2018 continuing through May 2018), and is scheduled to be paid his back pay within a few days.
6. On May 29, 2018, Toyota Lease Trust filed a Certification of Default of the May 29, 2018 stipulation. See attached Certification of Default.
7. Debtors will cure the default in full by June 10, 2018.

WHEREFORE, Debtor requests this Honorable Court to sustain the herein Objection to Wells Fargo's Certification of Default and enter the attached Order.

Dated: June 1, 2018

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Jermaine Harris, Esquire
Attorney for Debtors Daniel and Nicole Lee
100 South Broad Street, Suite 1523
Philadelphia, PA 19110
(215)385-1091

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ORDER

AND NOW, this _____ day of _____, 2018, upon consideration of Debtors' Objection to Certification of Default and any response thereto,

IT IS HEREBY ORDERED THAT Debtors' Objection is SUSTAINED and Toyota Lease Trust's Certification of Default is DENIED.

J.

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CERTIFICATE OF SERVICE OF OBJECTION TO CERTIFICATION OF DEFAULT

I, Jernaine Harris, Esquire, hereby certify that I served a true and correct copy of Debtors' objection to certification of Default upon the below listed via the court's electronic filing system:

Kevin G. McDonald, Esquire
KML Law Group, P.C.
701 Market Street, Suite 5000
Philadelphia, PA 19106-1532

William C. Miller, Esquire
Chapter 13 Trustee
PO Box 1229
Philadelphia, PA 19105

\s\

Jermaine Harris, Esquire
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